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April 17, 2014

Hon. Kimba Wood
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

By ECF

re: USA v. Hasinoff
#10 cr 162 (KMW)

Dear Judge Wood;

As the attorney for defendant Sabirhan Hasanoff I am in the process of preparing a constitutional challenge to his conviction, including the issue of the ineffective assistance of counsel, pursuant to 28 USC @ 2255. I am writing to request an Order from your Honor addressed to the Bureau of Prisons for the BoP to house Hasanoff [reg # 75730-083] at either the Metropolitan Detention Center in Brooklyn, or the Metropolitan Correction Center in Manhattan so that Hasanoff can assist me to prepare the @2255 motion. I was not previously Hasanoff's attorney in the District Court. Hasanoff is presently an inmate at FCI Allenwood. The needs for this request are:

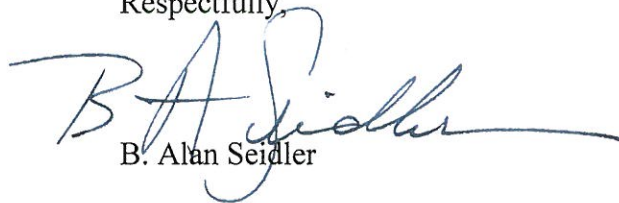
1. Hasanoff's prison e-mails are delayed and monitored even when sent by his attorney. Hasanoff's telephone calls are monitored even when Hasanoff makes a telephone call to his attorney. Hasanoff's written mail is read by BoP employees before prison officials give the mail to Hasanoff. The only method to insure the confidentiality of attorney/client communications is

to personally confer with Hasanoff at a prison. Otherwise, there is no protected communication between Hasanoff, and me as his attorney.

2. I am informed Hasanoff's case documents are in the range of 40,000 pages. Much of those case documents are of the type designated "semi-classified." Therefore, those semi-classified items can be possessed by his attorney, shown to Hasanoff by his attorney, but can not be given to Hasanoff by his attorney to keep. Therefore, all document review and analysis can only be done with Hasanoff in person in jail.

I made inquiry yesterday, but I do not know the Government's position concerning this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "B. Alan Seidler", with a long horizontal flourish extending to the right.

B. Alan Seidler

bas/ee